

Lisa Morgan

Subject: FW: Depositions of Ms. Aufdem-Brinke, Mr. Thaggard and Mr. Skinner

From: Lisa Morgan

Sent: Wednesday, May 31, 2023 12:46 AM

To: Adam Greivell <adam@greivelllawoffice.com>; Yosef Kuperman <ykuperman@frankdailylaw.com>

Cc: "Schaufelberger, Nicholas A." <nschaufelberger@tthlaw.com>; Frank Daily <info@frankdailylaw.com>

Subject: RE: Depositions of Ms. Aufdem-Brinke, Mr. Thaggard and Mr. Skinner

Dear Mr. Greivell,

I apologize for the late response. Kindly provide my office with copies of all pleadings, scheduling notices, court orders, and other papers previously filed in the action that should have been served with the Amended Complaint. I will also need the names of any witnesses that have been deposed in this matter and the court reporters utilized for those depositions. Once I have this information, we can schedule depositions. I should be able to move through the material quickly once you get it over to me.

In addition, we will need to depose your client. As such, we should select three dates. I assume your client is available on the dates listed below.

I will be filing a Motion to Extend the Scheduling Order dates. Please advise if you will consent. I am available for a telephone call tomorrow. If you are available, please let me know a good time to contact you.

Thanks and I look forward to working with you.

Sincerely,

Lisa Morgan

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EXHIBIT 2